

**Amendments to the Drawings**

Please amend the drawing as set forth in the attached Annotated Sheet.

Figure 2 previously had the upper PCB 10 and lower PCB 20 labels switched. The corrections are shown in the following Annotated Sheet. This was an unintentional error and the correct configuration is described in the specification and is shown in Figure 1. This alteration correctly represents the disclosed invention.

For the final version of the corrected diagram, please see the Replacement Sheet that is appended to this transmittal.

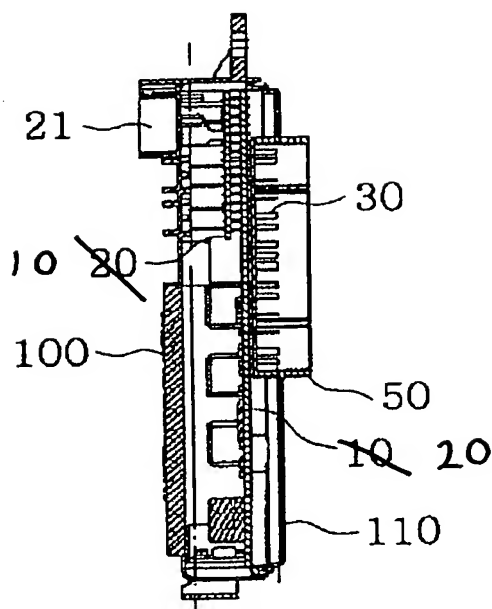
ANNOTATED SHEET



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[Fig. 2]



**REMARKS**

The Examiner has rejected claims 1-6 under 35 U.S.C. § 102(b) as being anticipated by Maue et al. (US 5,478,244), but has not rejected claims 7-10. The applicant respectfully disagrees that the prior art discloses an integrated module structure disclosing the use of one connector for each wire harness. While the general elements of fuses, relays, and PCBs are installed in the junction box of Maue, it is a unique and novel configuration of these elements that enables each harness to have a single multi-pole connector.

The independent claim 1 has been amended through the addition of material specifying that the integration between the first PCB and the I/O terminals of the second PCB. This clarifies the unique configuration of the materials in the disclosed invention that allows for each harness to have only one multi-pole connector.

An anticipation requires that the prior art reference must either expressly or inherently disclose each and every limitation in a claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Also, the elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Examiner is also invited to review Section 2131 of MPEP, entitled “2131 Anticipation - Application of 35 U.S.C. § 102 (a), (b), and (e)

It bears repeating that every element or function must be explicitly or inherently disclosed in the reference. To say it could be this or it could be that is the antithesis of an anticipation. It makes the rejection an oxymoron.

In the present invention, the upper PCB 10 and lower PCB 20 are integrally connected by a PCB connecting unit. Such a connecting unit cannot be equated to the Maue blades 98 and terminals 99/100 that form a series with several other blades and terminals to connect the two PCBs in the Maue invention. Nor is the configuration equivalent to the general components of “a cover 31, a rigid printed circuit board 33, a busbar and insulator assembly 35, a flexible printed circuit board 37, a housing 39 and a support bar 41” with which the Maue junction box 11 “serves to electrically connect wire harnesses 13, fuses 15, relays 17...through internal electric current carrying circuits.” Although the inventions both connect harnesses to the disclosed system, the highly efficient manner of the present invention significantly reduces the number of components required to achieve the union and also reduces the number of harnesses needed to control the system properly. In addition, the unique feature of the present invention is

accomplished, as seen in claims 3 and 4, by adopting entire circuits of the junction box and electric control module on each PCB, which is not anticipated by Maue. This is how the present invention creates outstanding effects.

The Examiner contends that Maue discloses the multi-pole connector of the present invention. While the housing/casing 39 of Maue does act as a substrate for conductive deposited metal traces, it in no way represents the integrated connector of claim 2. The Maue casing is used merely to carry a low current connecting a low beam and high beam relay within the circuit. In contrast, the multi-pole connector directly connects the upper and lower PCBs allowing the integration of a junction box and input/output circuit, and an electronic control module and input/output connectors circuit. This role requires the connector to handle more power than the housing/casing 39 as it integrates several of the circuit board components claimed separately in the Maue patent.

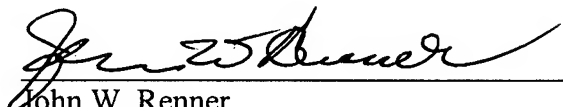
Claims 1 through 10 are pending in the application upon entry of the above amendments. Support for the claims and amendments exist in the specification as filed and in the specification and claims of the PCT application to which this application claims priority under 35 USC § 371. No new matter has been added. Favorable consideration of the pending claims is respectfully requested.

Should the Examiner believe that a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

In the event any fees are due in connection with the filing of this document, the Commissioner is hereby authorized to charge said fees to our Deposit Account No. 18-0988.

The claims as amended are not anticipated or obvious over the applied or prior art. The application is now believed to be in a condition of allowance. Early action to that effect is eagerly solicited.

Respectfully submitted,

  
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